REMARKS

The application includes claims 1-33 prior to entering this amendment.

The examiner rejected claims 1-33 under 35 U.S.C. § 103(a) over Billington et al. (U.S. Patent 7,103,760) in view of Konetski et al. (U.S. Patent Application Publication 2002/0103880) and further in view of Clough et al. (U.S. Patent 6,670,982).

The applicants amend claims 1, 3, 11, 19, and 27 and cancel claims 13 and 21 without prejudice.

The application includes claims 1-12, 14-20, and 22-33 after entering this amendment.

The applicants do not add new matter and respectfully request reconsideration.

Claim Rejections Under § 103

The examiner rejected claims 1-33 under §103(a) over Billington in view of Konetski and Clough. The applicants disagree at least for the reasons that follow.

Claim 1 is directed to a thin client device integrated with a consumer electronic device for use in a network. The device comprises, as recited in amended claim 1, a controller configured to control data transfer through the thin client device between different ports to enable *archiving the data* in a server on the network *responsive to automatically detecting the existence of the memory device through the data/memory port and substantially simultaneously with selective interfacing of the memory device with the data/memory port.*

In general, Billington shows a peripheral device 12 providing at least two data connections for simultaneous connection with at least two other devices 14, 36, or 37 to enable transfer of data between the devices.[1] The peripheral device 12 may comprise a workstation, external drive, or CD reader/writer and the connectable devices 14, 36, and 37 may include a processor and an audio or video player.[2] The examiner alleged that Billington shows detecting a device for determining device compatibility.[3] Nevertheless, Billington says nothing about *archiving the data* in a server *responsive to automatically detecting the...device.* As further recited in claim 1, this archiving is associated with transfer of the data to the server through different ports of the thin client device, that is, the controller enables *transferring substantially*

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1   The peripheral device 12 also includes a power supply 18 so that the devices 14, 36, or 37 may be connected
     without requiring separate power cables for the devices as would result in cord accumulation. Billington, figure
     1, abstract, column 1, lines 39-42, and column 8, lines 48-50.
2   Billington, column 8, lines 43-60 and column 9, lines 21-28.
3   Office Action mailed 07/06/2009, page 18, first paragraph.

unidirectionally data stored at the memory device through the data/memory port to the server via the network port. It will be noted that the compatibility testing discussed in Billington is conducted only through the *one port* that connects the peripheral device with the connectable devices 36 and 37. Furthermore, this compatibility testing normally would involve a *two-way* exchange of protocol data between the peripheral device and the connectable device to negotiate compatible protocols or for disabling the power and/or data port connections if an incompatible device is connected.[4]

Elsewhere in the office action, the examiner appeared to concede that Billington does not specifically disclose selectively interfacing with a memory device, transferring substantially unidirectionally data stored at the memory device through the data/memory port to the server via the network port, and archiving the data in a hard disk drive of the server responsive to automatically detecting the memory device through the data/memory port substantially simultaneously with selective interfacing of the memory device with the data/memory port.[5] However, the examiner alleged that these disclosures are supplied by Konetski and Clough.

In particular, the examiner alleged that Konetski discloses retrieving content based on a signal generated by software either at the thin media client or at the computer system.[6] The examiner further alleged that Clough clearly discloses this transfer is responsive to or conditioned on *automatically* detecting the memory device through the data/memory port.[7] However, in Clough, it is not the detection of a memory device, per se, that initiates automatic transfer, and rather it is the monitoring of an image data file storage process.[8] That is, if a photographer captures a new image with a digital camera, then logic 122 inside Clough's digital media card 114, which is inserted into the camera as a replacement for a conventional digital media card, may automatically transfer the image, via wireless connection, to a laptop PC 102B, for example.[9] Note, that this transfer is not, as recited in amended claim 1, responsive to *automatically detecting the existence of the memory device through the data/memory port* but rather is based on storage process operations occurring when a new image is generated within the

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4   The disablement feature is discussed in Billington, column 9, lines 9-13.
5   Office Action mailed 07/06/2009, page 4, first paragraph.
6   Office Action mailed 07/06/2009, page 4, second paragraph. The examiner noted that this content may be retrieved according to criteria specified by the user. See page 18, first paragraph.
7   Office Action mailed 07/06/2009, page 4, second paragraph.
8   Clough, column 4, line 65 to column 5, line 6. It appears that the number of files that the camera stores before transfer may be varied or selected to allow "one or more" image data files to be transferred at a time.
9   Clough, column 4, lines 4-22, and column 4, line 65 to column 5, line 6.

camera (if you will, based not on detecting the device itself but rather based on monitoring a storage process invoked when new content is generated). Thus, even if it would have been obvious to combine Billington, Konetski, and Clough (which it is not given, for example, that Clough is only concerned with a new type of media card for digital cameras), the combination would not have shown all of the elements recited in amended claim 1.

For at least these reasons, then, amended claim 1 defines over the proposed combination of Billington, Konetski, and Clough. Moreover, corresponding language is contained in each of independent claims 11, 19, and 27. Thus, these claims also, together with their respective dependent claims, define over the proposed combination.

While the applicants believe there is sufficient grounds, without more, to find all of the pending claims patentable over Billington, Konetski, and Clough, the applicants have further amended the independent claims to introduce other language patentably defining over the art. In amended claim 1, in particular, the thin client is recited as further including *a first internal line configured to couple the data/memory port to the signal processor; a second internal line configured to couple the data/memory port to the network interface; and the controller configured to enable parallel data transfer of the media content using both the first internal line and the second internal line such that the media content is concurrently available to the signal processor for archiving in the hard disk drive of the server and for processing responsive to automatically detecting the existence of the memory device.*[10] Similarly, independent claims 11 and 19 recite *concurrently with archiving the data, internally providing the media content to a signal processor integrated with the thin client for processing or playback.* Correspondingly, claim 27 recites *means for configuring the controller to enable parallel data transfer of the media content to the first internal line and the second internal line such that the media content is concurrently available to the signal processor for archiving in the hard disk drive of the server and for processing or playback responsive to automatically detecting the existence of the memory device.* In accordance with applicants' teachings, it will be noted that the structure and/or operations recited permit, to give one example, a FLASH memory source to be automatically detected by the thin client device so as to initiate archival storage of a movie to a

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10 This language is adequately supported in applicants' original specification. For example, see Fig. 2 showing respective internal lines that connect, on the one hand, the memory card with, on the other hand, the signal processing element or network interface. Also note the control lines from the controller. See also paragraph [0018].

network server while allowing the integrated signal processor, which is capable of processing or decoding the movie data, to provide concurrent playback of the movie for viewing without further delay.[11] These combined structures and functions are not described either in Billington, Konetski, and Clough, taking these references individually or in combination.

In accordance with the above, then, independent claims 1, 11, 19, and 27 recite subject matter patentably defining over Billington, Konetski, and Clough. Respective dependent claims 2-10, 12, 14-18, 20, 22-26, and 28-33 likewise patentably define over the cited art.
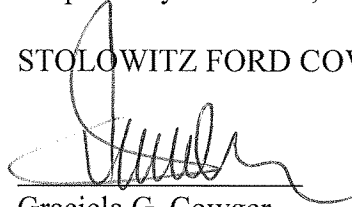
CONCLUSION

For the foregoing reasons, the applicants respectfully request reconsideration and allowance of claims 1-12, 14-20, and 22-33. The applicants encourage the examiner to call the undersigned if an interview would further prosecution.

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Respectfully submitted,

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11 Applicants' original specification, paragraph [0018].